

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Jibril L. Ibrahim
7554 South Arbory Lane
Laurel, MD 20707

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Vizio Corporation
39 Tesla
Irvine, CA 92618

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No.

1 GJH 22CV0462

(to be filled in by the Clerk's Office)

Jury Trial:

☒ Yes ☐ No

(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Jibril L. Ibrahim</u>
Street Address	<u>7554 South Arbory Lane</u>
City and County	<u>Laurel, MD ?</u>
State and Zip Code	<u>Maryland 20707</u>
Telephone Number	<u>(202) 910-0763</u>
E-mail Address	<u>Jibril Ibrahim 7554@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Vizio Corporation</u>
Job or Title (if known)	<u></u>
Street Address	<u>39 Tesla</u>
City and County	<u>IRVINE</u>
State and Zip Code	<u>CALIFORNIA 92618</u>
Telephone Number	<u>(844)-254-8087; (844) 324-5953</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name

Self Storage Plus

Job or Title
(if known)

Street Address

901 Southern Avenue S.E.

City and County

Oxon Hill P.G. County

State and Zip Code

MD. 20745

Telephone Number

(240) 346-7186

E-mail Address
(if known)

Defendant No. 3

Name

Homeland Security

Job or Title
(if known)

Street Address

3801 Nebraska Ave N.W

City and County

Washington

State and Zip Code

District of Columbia 20002

Telephone Number

(202) 282-8000

E-mail Address
(if known)

Defendant No. 4

Name

Mark Doe

Job or Title
(if known)

DC Police Officer

Street Address

300 INDIANA AVE N.W

City and County

Washington

State and Zip Code

District of Columbia 20001

Telephone Number

unknown

E-mail Address
(if known)

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

**UNITED STATES DISTRICT COURT
GREENBELT DIVISION
6500 CHERRYWOOD LANE
GREENBELT, MARYLAND**

JIBRIL L. IBRAHIM
7554 South Arbory Lane
Laurel, MD 20707
Plaintiff

v

VIZIO CORPORATION
39 Tesla
Irvine, CA 92618
Defendant

SELF-STORAGE PLUS
901 Southern Avenue S.E.
Oxon Hill, MD 20745
Defendant

Case No.

HOMELAND SECURITY
3801 Nebraska Avenue N.W.
Washington, D.C. 20002
Defendant

MARK, PAUL, NATE AND KAREN DOE
300 Indiana Avenue, N.W.
Washington, D.C. 20001

D.C. CHIEF OF POLICE
CHIEF ROBERT CONTEE
300 Indiana Avenue, N.W.
Washing D.C. 20001
Defendants

DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE MAYOR

Mayor Muriel Bowser
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Defendant

OFFICE OF POLICE COMPLAINTS

1400 I Street N.W., Suite 700
Washington, D.C. 20004
Defendant

Defendant No. 5

Paul Doe
Police Officer
300 INDIANA AVE N.W
Washington
District of Columbia 20001

Defendant No. 6

Chief Robert Contee
D.C. CHIEF OF POLICE
300 INDIANA AVE. N.W
Washington, D.C. 20001
(202) 727-1079, (202) 727-4218

Defendant No. 7

Nate Doe
DC Police Officer
300 INDIANA AVE N.W
Washington
District of Columbia 20001

Defendant No. 8

Karen Doe
DC Police Officer
300 INDIANA AVE N.W
Washington,
District of Columbia 20001

Defendant No. 9

District of Columbia Government
OFFICE OF THE MAYOR
MAYOR Muriel Bowser
1350 Pennsylvania Ave N.W
Washington
District of Columbia 20004

Defendant No. 10

OFFICE OF POLICE COMPLAINTS
1400 I Street N.W. Suite 700
Washington
District of Columbia 20004
(202) 727-3838

additional Defendants 5(a)

Paul Doe - citizen of District of Columbia

Nate Doe - citizen of the District of Columbia

Karen Doe - police officer within District of Columbia

Mark Doe - police officer within District of Columbia

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Jibril Ibrahim, is a citizen of the State of (name) Maryland.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Robert Contee, is a citizen of the State of (name) District of Columbia Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Vizio Corporation, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) Md. D.C. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

multiple Rico violations, cybercrimes attempt burglaries of property, destruction of property. Plaintiff seeks two million dollars and treble damages for Rico conspiracies

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached Amended Complaint

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

- ① punitive damages from each defendant; ② million
dollars; treble damages; pain, suffering, mental
and emotional distress; equitable relief and,
injunctive relief.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Feb. 24, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Jibril Sugman Ibrahim
Jibril E. Ibrahim

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address